

State of Alabama  
County of Covington

**AFFIDAVIT**

My name is Robert Brooks. I am the maternal grandfather and adoptive father of Yancey Brooks. She was born on November 23, 1981 and has resided with me since September of 1982. I resided at 2A Tuscarorra Street, Lockhart, AL 36455 for over thirty years until moving in approximately 2003. This residence was less than ½ of a mile from the Louisiana-Pacific facility.

Yancey has been diagnosed with and suffered from cerebral palsy her entire life. She has also been diagnosed with mental retardation.

Yancey has never been employed in any industry, never made use of any industrial chemical compounds and has never been employed by any of the defendants.

Yancey's mother lived in the Flora/Lockhart area before her conception and birth. Yancey attended school in the Flora/Lockhart area. The school was within a mile of Louisiana-Pacific wood treatment facility in Lockhart.

I have acted as next of friend for Yancey's claim for personal injuries. It is my belief that Yancey's medical conditions are a result of exposure to chemicals that were released into the environment from the Louisiana-Pacific facility near our home. Neither I nor Yancey knew that the chemicals which were released into the environment from the Louisiana-Pacific facility caused or promote such severe medical conditions.

Robert Brooks  
Robert Brooks

Sworn to and subscribed before me this 11 day of April,  
2006.

Wendy W. Alex  
NOTARY PUBLIC

My Commission Expires: 9-13-08

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